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Attorneys for *Santa Rosa Mall, LLC*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

**NOTICE OF HEARING OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY AND  
MEMORANDUM IN SUPPORT THEREOF AND/OR TO DECLARE THAT THE INSURANCE  
PROCEEDS ARE NOT PART OF THE BANKRUPTCY ESTATE**

PLEASE TAKE NOTICE that on May 7, 2019, Santa Rosa Mall, LLC (“Santa Rosa Mall”), filed an *Emergency Motion for an Order Shortening Notice with Respect to Motion for Relief from the Automatic Stay and Memorandum in Support Thereof and/or to Declare that the Insurance Proceeds are not Part of the Bankruptcy Estate* (the “*Emergency Motion to Shorten*”, Docket No. \_\_\_\_).

PLEASE TAKE FURTHER NOTICE that a hearing on the *Motion for Relief from the Automatic Stay and Memorandum in Support Thereof and/or to Declare that the Insurance Proceeds are not Part of the Bankruptcy Estate* (the “*Stay Relief Motion*”, Docket No. 3475) filed on May 1, 2019 for the entry of an order declaring that the insurance proceeds are not part of the bankruptcy estate and/or grant limited relief from the automatic stay so that it may seek non-bankruptcy relief against non-debtor third-parties, will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 118, 300 Quarropas Street, White Plains, New York 10601 (the “Bankruptcy Court”) on **May 21, 2019 at 10:00 A.M. (Eastern Time)** (the “Hearing”), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses or objections (the “Objections”) to the *Stay Relief Motion* may be asserted in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall be filed with the Bankruptcy Court (a) by attorneys practicing in the Bankruptcy Court, including attorneys admitted pro hac vice, electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and (b) by all other parties in interest, on a CD-ROM, in text searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and shall be served in accordance with the Amended Order Implementing Certain Notice and Case Management Procedures, entered on November 1, 2018 (Docket No. 405), so as to be filed and received no later than **May 14, 2019 at 4:00 P.M. (Eastern Time)** (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served with respect to the *Stay Relief Motion*, Santa Rosa Mall may, on or after the Objection Deadline, submit to the Bankruptcy Court a proposed order, which may be entered without further notice or opportunity to be heard.

Respectfully submitted.  
Dated: May 7, 2019.

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